
TECHNICAL REVIEW DOCUMENT
for
OPERATING PERMIT 03OPWE260

Waste Management of Colorado, Inc. – Buffalo Ridge Landfill
Weld County
Facility ID: 1230448

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September 2011
Revised November 2011

1. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan, and Compliance Status of Emission Units covered within the Colorado Title V Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA, during Public Comment, and for other interested parties. Information in this report is primarily from the renewal application received on April 3, 2009, and additional submissions on April 6, 2009 and July 17, 2009. Conclusions were also made based on information provided from previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility, made in conjunction with the processing of this operating permit application, have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

2. Source Description

The Buffalo Ridge Landfill is classified as a municipal solid waste landfill, which falls under the Standard Industrial Classification 4953. This facility is located at 11655 WCR 59, Keenesburg, Weld County, Colorado. There are no affected states within 50 miles of this facility. The following Federal Class I designated areas are within 100 kilometers of the plant: Rocky Mountain National Park

The current Operating Permit was issued April 1, 2005. The 2010 inspection found that the facility's Title V permit expired on April 1, 2010 because the renewal application was submitted late. In consultation with the source, Case # 2010-068 proceeded directly to a Compliance Order on Consent issued on November 11, 2010. The Division received a signed COC on January 25, 2011 from Waste Management.

This source is now categorized as a minor stationary source for NANSR (Potential to Emit <100 tons/year of VOC or NOX). Any future modification which is major by itself (Potential to Emit \geq 100 tons/year of either VOC or NOX) may result in the application of the NANSR review requirements.

Facility-wide emissions are outlined below:

Pollutant	Potential-to-Emit (tons/yr)	2008 Actual Emissions (tons/yr)
PM ₁₀	131.03	9.99
PM	427.33	32.46
CO*	2.50	0.27
VOCs*	32.76	3.48
HAPs*	8 of any single HAP 20 of total HAPs	~0.54 total

*The potential-to-emit CO, VOC, and HAPs emissions were estimated using the modeling year 2082 and not the estimated closing date. The LandGEM program could not model past year 2082.

Potential to emit and actual emissions are based on the APEN received in July 2009 listing emissions for 2008. Hazardous air pollutant emissions were also calculated to show emissions are below major source levels.

Greenhouse Gases

The potential to emit greenhouse gases at this facility is over 100,000 TPY CO₂e. This is calculated using the methane emissions from Landgem in the year 2082. Future modifications at this facility that exceed 100,000 TPY CO₂e may be subject to regulation. On July 20, 2011, a final rule regarding biogenic CO₂ emission was published in the Federal Register. This final action defers, for a period of three years, the application of the Prevention of Significant Deterioration (PSD) and Title V permitting requirements to carbon dioxide (CO₂) emissions from bioenergy and other biogenic stationary sources (biogenic CO₂). As it relates to this facility, biogenic CO₂ includes all CO₂ generated from the biological decomposition of waste in landfills and CO₂ emissions from the combustion of biogas collected from the biological decomposition of waste in landfills. Note that the emission of biogenic methane is still a contributing factor in calculating greenhouse gas emissions from the facility.

Compliance Assurance Monitoring (CAM) Applicability

The landfill does not utilize any control equipment to meet the limits of this permit. CAM does not apply.

3. Discussion of Modifications Made

Source Requested Modifications

- Parent corporation information, responsible official, and permit contact person were updated based on an E-mail received March 26, 2012 from Tom Schweitzer.
- Removed the Safety-Kleen degreasing unit from the insignificant activities list. The division received an E-mail from Tom Schweitzer on March 28, 2012 stating that there are no Safety-Kleen units being used.
- Permit limits for CO, VOC, PM, and PM₁₀ were revised based on the APEN received July 16, 2009. Requested permit limits for CO and VOCs were significantly reduced based on LandGEM estimates using updated actual and projected waste acceptance rates. The reduced waste acceptance rate also extended the closure date to year 2184. Emissions were estimated using the modeling year 2082 and not the estimated closure date, because the LandGEM program could

not model past year 2082.

Other Modifications

In addition to the modifications requested by the source, the Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal.

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The monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

Section I – General Activities and Summary

- Revised the language in Condition 1.4 to include Section IV, Condition 3.d and to note that only part of Condition 3.g is state-only enforceable (last paragraph). Note that Section IV, Condition 3.d (affirmative defense provisions for excess emissions during malfunctions) is state-only until approved by EPA in the SIP.
- Made revisions to the language in Condition 3 (prevention of significant deterioration) to be more consistent with other permits.
- Added language in Condition 3 (non-attainment new source review) for operation in an ozone nonattainment area.

Section II – Specific Permit Terms.

- Condition 2.4
 - Removed semi-annual certification requirement for fugitive emissions and instead relies on the control plan and waste acceptance limit to determine compliance.
 - Removed requirement for inactive stockpile(s) to be revegetated within one year of disturbance.
 - Updated Condition 2.4.2 to read, “Material stockpiles shall be watered as necessary or revegetated to control fugitive particulate emissions.”
- Condition 2.5
 - Specified that unpaved haul roads only need to be watered during days of operation.
- Updated NSPS WWW language to newest version
 - Landfill Capacity added to permit: 47,847,293 Mg
 - Added more specific standards for non-degradable exemptions.
- Moved the 2000 gallon gasoline storage tank out of the insignificant activities.

- Under the “catch-all” provisions in Regulation No. 3, Part C, Section II.E, sources that are subject to any federal or state applicable requirement may not be considered insignificant activities. EPA promulgated National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities in 40 CFR Part 63 Subpart CCCCCC which were published in the federal register on January 10, 2008 and apply to area sources (minor sources for HAPS). This facility is a minor source for HAP emissions; therefore, the provisions in Subpart CCCCCC apply to the gasoline tank at this facility.
 - Note that since the provisions in 40 CFR Part 63 Subpart CCCCCC have not been adopted into Colorado Regulation No. 8, Part E, these requirements are not state-enforceable and the “catch-all” provisions for APEN reporting and minor source permitting do not apply. Therefore, since actual VOC emissions from this tank are below 1 ton/yr, the tank is exempt from the APEN reporting and minor source permitting requirements. In the event that the Division adopts these requirements this GDF will be subject to the APEN reporting and minor source permitting requirements and the requirements in 40 CFR Part 63 Subpart CCCCCC will be state-enforceable.
 - Subpart CCCCCC is not state-enforceable therefore, gasoline throughput does not need to be submitted to the Division but, monthly records should be kept and provided upon request
- This source is subject to Control of Volatile Organic Compounds, Regulation No. 7, Section VI.B.3.b, which requires approved fittings for a vapor recovery system to be installed on all gasoline storage tanks. To minimize gasoline vapor emissions, the operator shall ensure that the tanks are only filled with gasoline from a certified delivery truck equipped with an approved vapor recovery system and that the system is properly connected during the entire filling operation (condition 4).

Section IV – General Permit Conditions

- The language in this section was updated to the most recent version.

Appendices

- Removed the Safety-Kleen degreasing unit from the insignificant activities list. The division received an email from Tom Schweitzer on March 28, 2012 stating that there are no Safety-Kleen units being used.
- Added scanned plot plan to Appendix A.
- Appendix B and C were replaced with latest version.
- Changed the mailing address for EPA in Appendix D.
- Changed Air Pollution Control Division contact to Matt Burgett in Appendix D.